

EXHIBIT 2

In the Matter of:

Rysta Leona Susman, et al.

vs.

The Goodyear Tire & Rubber Company

Jacob Summers

October 24, 2018



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1 A No, sir.

2 Q How long were you and Brooklyn married?

3 A About three months.

4 Q Any other marriages for you?

5 A No.

6 Q And why did that marriage end?

7 A I caught her cheating on me.

8 Q Your employment background, I know you started
9 working at -- at Dandee; help me out I forgot the date,
10 but sometime in 2014, was it? Accident was May of 2015,
11 so when would you have started with Dandee?

12 A I'm not really good with the date but about
13 probably, I don't know, four months before that.

14 Q Okay. So, we're talking right at the end,
15 maybe, of 2017, beginning of 2018?

16 A Yes, sir.

17 Q All right. And you were employed as a laborer
18 for them?

19 A Yes.

20 Q From the time you started work up until your
21 job with Dandee, what kind of jobs did you hold?

22 A Before Dandee I had worked in factories,
23 various factories. I had had a few food jobs, and then
24 just various work that I could find to do.

25 Q When you say "food jobs" would that be fast

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1 Q Okay. Better way for me to ask where I was
2 going is -- is just to say, was Larry Blair the driver
3 for your crew that day?

4 A For the truck that I was riding in.

5 Q So, was -- would it have been Larry Blair's
6 job, as far as you know, to inspect the truck to --
7 before that shift started?

8 A Yes.

9 Q And from your work experience and training at
10 Dandee, did that inspection include checking the brakes
11 and the lights and the tires?

12 A Yes.

13 Q All right. Did you ever observe anyone at
14 Dandee have to add air to the tires to the trucks?

15 A Yeah, I've seen -- Yes.

16 Q Do you know whether the inflation pressure was
17 checked on the day of the accident for the truck that you
18 were in?

19 A No.

20 Q Did you see Larry --

21 MR. FARRAR: I don't know if he's answering no
22 it wasn't checked, or no he doesn't know.

23 MR. BOTT: Okay. That's --

24 MR. FARRAR: It was sort of a --

25 MR. BOTT: That's fair.

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1 MR. FARRAR: I don't know.

2 MR. BOTT: Let's clear it up.

3 THE WITNESS: No.

4 MR. BOTT: Yeah.

5 THE WITNESS: I -- I don't know.

6 Q (By Mr. Bott) So, the -- Do you know whether
7 it was checked by anyone that day? Let's go with that
8 question.

9 A I do not.

10 Q Okay. Did you observe Larry Blair do his
11 pre-shift inspection that day?

12 A No, I did not.

13 Q Do you know what time you started work that
14 day?

15 A I don't want to guess. Somedays it differed,
16 I'm not honestly sure what time we started that day.

17 Q So, because you were never -- because you were
18 never a driver, I assume you never would've had the
19 responsibility of doing a pre-shift inspection?

20 A Of the vehicle?

21 Q Yes.

22 A No.

23 Q Is that correct?

24 A That's correct.

25 Q There was reference in some of the documents to

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1 A No, I -- I don't know.

2 Q Do you know whether you had any alcohol or
3 drugs during the 24 hours before you -- before the day of
4 the accident?

5 A Typically after work I would have a beer or
6 two.

7 Q Okay. At your home or at somebody else's
8 house?

9 A Normally at home.

10 Q Did -- Shane Loveland was your crew -- one of
11 your crew members for several months while you were
12 working there, right?

13 A Yes.

14 Q And did you ever meet his mother?

15 A I don't re- -- I don't know. I don't remember.

16 Q Did you ever know his sister?

17 A No.

18 Q There was some testimony that you might've been
19 at his sister's house right next to Dandee Construction a
20 few times; do you remember anything about that?

21 A That's been a long time ago. I don't remember.
22 I mean --

23 Q Okay.

24 A -- possibly.

25 Q Were you taking any prescription medications at

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1 the time of the accident?

2 A No.

3 Q Do you recall the accident itself?

4 A For what -- Yeah, mostly.

5 Q Do you recall where you had been first that
6 day; what job you were on first?

7 A No, I do not.

8 Q Do you recall where you were driving to?

9 A I believe Hastings.

10 Q Were you following somebody or were you on your
11 own?

12 A I don't remember, but I think we were following
13 someone. Normally we didn't go to jobsites alone.

14 Q Why not?

15 A Because you have to have a crew lead there.

16 Q Okay. The -- Do you remember what position you
17 were in in the cab?

18 A In the truck, yeah, I was sitting in the
19 middle.

20 Q Okay. And you were not wearing your seatbelt,
21 correct?

22 A Correct.

23 Q Mr. Blair was driving?

24 A Yes.

25 Q And he was not wearing his seatbelt, correct?